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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(**HONORABLE BARRY T. MOSKOWITZ**)

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO HARO,

Defendant.

Case No.: 08cr0649-BTM

Date: April 11, 2008

Time: 1:30 p.m.

NOTICE OF MOTIONS AND MOTIONS TO:

**(1) COMPEL DISCOVERY/PRESERVE
EVIDENCE; AND**

(2) LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
CHRISTOPHER ALEXANDER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on April 11, 2008, at 1:30 p.m., or as soon thereafter as counsel may be heard, the accused, Mario Haro, by and through his attorneys, John C. Ellis, Jr. and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions outlined below.

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MOTIONS

Defendant, Mr. Haro, by and through his attorneys, John C. Ellis, Jr. and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- (1) Compel Discovery/Preserve Evidence; and
- (2) Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at or before the time of the hearing on these motions.

Respectfully submitted,

Dated: March 26, 2008

/s/ John C. Ellis, Jr.
JOHN C. ELLIS, JR.
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Haro
john_ellis@fd.org